

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GEORGE A. JACKSON, et al.,)	
)	
Plaintiffs,)	
)	
v.)	C. A. No. 05-823-SLR
)	
STANLEY TAYLOR, et al.,)	JURY TRIAL REQUESTED
)	
Defendants.)	

**AFFIDAVIT OF TREATMENT
ADMINISTRATOR PATRICIA DITTO**

I, Patricia Ditto, having been duly sworn by law, do hereby depose and state as follows:

1. I am employed by the State of Delaware Department of Correction ("DOC") as the Correctional Treatment Administrator at the Sussex Correctional Institution ("SCI"). I have been employed by the DOC since March 1980, and have held the position of Treatment Administrator since January 1, 2000. As Treatment Administrator, my duties include supervision of SCI counseling staff, classification staff, recreation staff, law library staff and administrative specialists.

2. SCI houses an all-male population of medium, and minimum security inmates. There are several programs at SCI designed to facilitate inmate rehabilitation. These programs include educational opportunity, vocational training, work assignments, and a variety of other classes and programming.

3. At SCI, inmates can be classified to several different jobs during their period of incarceration. Some examples include woodshop worker, educational tutor (for inmates taking their GED examinations), janitor, laundry worker, and groundskeeper.

4. Inmate workers at SCI are paid a nominal salary for each hour they are employed. While some inmates may prefer outside work as a groundskeeper or in the woodshop, these jobs are assigned based upon the inmate's good behavioral records, proper classification (i.e., security risk), and demonstrated trustworthiness. Some jobs permit inmates to develop vocational skills they can apply towards a career upon their release from the DOC.

5. Inmates are not "forced" to work at a job. As stated above, if inmates are assigned to jobs in the prison, they are paid for their time. Otherwise, they are required to participate in other programs at SCI (such as an educational program), as part of their rehabilitation. An inmate is not permitted to serve a term of incarceration without entering into an educational program or treatment program, as this runs contrary to the rehabilitative goals of the DOC.


6. Many inmates are employed in the SCI kitchen, in part because there are more opportunities to work in this vocation (i.e., more staff is required to run the SCI kitchen than, for example, needed as educational tutors), and because of the modest qualifications required. Inmates residing in the Medium Building of SCI work at the SCI kitchen, because their classification levels (which lead them to be assigned to either of these two buildings in the first place) meet the standards for kitchen jobs.

7. Plaintiff George Jackson was classified out of the kitchen and into the laundry on July 10, 2006. On September 17, 2007, Jackson was classified out of laundry and into education as an education tutor.

8. I have made these statements based upon my personal knowledge, specialized training, and experience as an employee of the Department of Correction.


Patricia Ditto

SWORN AND SUBSCRIBED before me this 16 day of May, 2008.


Notary

SHARON A. BUSS
Notary Public, State of Delaware
My Commission Expires May 21, 2009

